

TODD A. ROBERTS (SBN 129722)  
 NICOLE S. HEALY (SBN 157417)  
 ROPERS, MAJESKI, KOHN & BENTLEY  
 1001 Marshall Street, Suite 500  
 Redwood City, CA 94063-2052  
 Telephone: (650) 364-8200  
 Facsimile: (650) 780-1701  
 Email: todd.roberts@rmkb.com  
 nicole.healy@rmkb.com

Attorneys for Defendants  
 TLC RESIDENTIAL, INC., a corporation, and  
 FRANCISCO MONTERO, an individual

UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA

THOMAS E. PEREZ, Secretary of Labor,  
 United States Department of Labor,

Plaintiff,

v.

TLC RESIDENTIAL, INC. a corporation, and  
 FRANCISCO MONTERO, an individual,

Defendants.

Case No. 15-cv-02776-WHA

~~PROPOSED~~ ORDER GRANTING  
 DEFENDANTS TLC RESIDENTIAL, INC.  
 AND FRANCISCO MONTERO'S  
 ADMINISTRATIVE MOTION TO FILE  
 DOCUMENTS IN SUPPORT OF  
 OPPOSITION TO MOTION FOR  
 SUMMARY ADJUDICATION UNDER  
 SEAL PURSUANT TO L.R. 7-11 AND 79-5

Date: October 19, 2016  
 Time: 8:00 a.m.  
 Ctrm. 8 – 19<sup>th</sup> Floor  
 Judge: Hon. William H. Alsup

WHEREAS Defendants TLC Residential, Inc. and Francisco Montero filed an  
 Administrative Motion to File Documents Under Seal, pursuant to Civil Local Rules 7-11 and 79-  
 5, requesting leave to file unredacted versions of the following documents under seal:

| Documents to be Publicly Filed<br>in Redacted Form  | Basis for Filing Unredacted<br>Documents Under Seal                           |
|---|---|
| Portions of Memorandum of Points and<br>Authorities in Support of Defendants'<br>Opposition to Plaintiff's Motion for<br>Summary Adjudication | Contains information identifying house<br>parents and assistant house parents |
| Portions of the declarations of current and<br>former TLC House Parents   | Contains information identifying house<br>parents and assistant house parents |
| Excerpts of the Transcripts of Depositions<br>of Pamela Davis and Julie Bento   | Contains information identifying house<br>parents and assistant house parents |


1           **WHEREAS**, a compelling reason exists to permit Defendants to file under seal  
2 documents containing non-public information identifying TLC's current and former house  
3 parents; and

4           **WHEREAS**, Defendants have electronically filed redacted versions of the above  
5 documents with the Court; and

6           **WHEREAS**, Defendants will serve Counsel for Plaintiff Secretary of Labor with  
7 unredacted copies of Defendants' sealed documents by electronic mail;

8           **NOW THEREFORE, FOR GOOD CAUSE SHOWN, IT IS HEREBY ORDERED**  
9 that the foregoing unredacted documents filed in support of Defendants' Opposition to Plaintiff's  
10 Motion for Summary Adjudication shall be filed under seal.

11 Dated:       November 28, 2016.

12   
13 \_\_\_\_\_  
14 HONORABLE WILLIAM H. ALSUP  
15 UNITED STATES DISTRICT JUDGE  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

Ropers Majeski Kohn & Bentley  
A Professional Corporation  
Redwood City